

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CENTRAL DIVISION**

UNITED STATES OF AMERICA)	
)	No. 15-CR-315
v.)	
)	Judge Thomas M. Durkin
JOHN DENNIS HASTERT)	

DEFENDANT’S MOTION FOR CONTINUANCE OF SENTENCING

Defendant John Dennis Hastert, by and through his counsel, as a result of the defendant’s ongoing medical condition and care, hereby moves this Honorable Court to continue the sentencing currently scheduled for February 29, 2016, and to extend the dates by which the parties are to file their sentencing memoranda. In further support of this motion, the defendant states as follows:

1. On October 28, 2015, the defendant, Mr. Hastert, entered a plea of guilty as to Count 2 of the indictment in the above-captioned matter. That same day, this Honorable Court entered the following schedule with respect to sentencing: the Government’s version of the offense was to be submitted by December 2, 2015; the defendant’s version of the offense was to be submitted by January 4, 2016; objections to the presentence investigation report are to be filed by February 15, 2016; responses and sentencing memoranda are to be filed by February 22, 2016; and sentencing is set for February 29, 2016.

2. Shortly thereafter, during the first week of November, Mr. Hastert was admitted to the hospital. While in the hospital, he was treated for three main conditions: (1) a spinal infection requiring spinal surgery, (2) a severe blood infection, and (3) a stroke. Mr. Hastert

remained hospitalized from the first week of November 2015 through January 15, 2016, when he was discharged.

3. His physician recently advised as follows. Mr. Hastert will require continuing home care and rehabilitation for at least four to six weeks to treat the above-mentioned three main conditions. Mr. Hastert continues to need assistance for most daily activities, and also needs both a walker and a leg brace to walk in his household. He will also need close follow up with several specialists during this process. When home care is complete, Mr. Hastert will likely be recommended for outpatient physical therapy, which could last between six and twelve additional weeks depending upon the course of recovery.

4. As a result of his medical condition and ongoing care, Mr. Hastert and his counsel have been unable to prepare for sentencing; efforts to date have necessarily been, and in the near future will continue to be, focused on Mr. Hastert's recovery.

5. Counsel for Mr. Hastert contacted counsel for the Government, and the Government does not object to a continuance of the sentencing date or the other relief sought by this motion.

6. In light of his medical condition and ongoing treatment, Mr. Hastert respectfully submits that good cause exists for this Honorable Court to continue the sentencing currently scheduled for February 29, 2016, and to extend the time for the parties to file their respective sentencing-related submissions.

WHEREFORE, the defendant respectfully requests that this Honorable Court grant this motion and continue the sentencing currently scheduled for February 29, 2016, and set a status hearing for March 7, 2016, at 9 a.m., or such later date as is convenient for the Court and the parties, at which time Mr. Hastert's counsel will further report to the Court regarding Mr. Hastert's condition. In addition, the defendant respectfully requests that this Honorable Court extend the time for the parties to file their respective sentencing submissions, and that such dates be set at the requested status hearing.

Dated: January 22, 2016

Respectfully submitted,

By: /s/ John N. Gallo

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Counsel for John Dennis Hastert

CERTIFICATE OF SERVICE

I, Geeta Malhotra, hereby certify that, on January 22, 2016, I caused a copy of the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Geeta Malhotra